

Exhibit F

From: [Sivinski, Stephanie](#)
To: [Henrik Parker](#)
Cc: [oceansemi-dlf](#); [Timothy Devlin](#); [Harper, David H.](#); [McCombs, David L.](#)
Subject: RE: Ocean Semiconductor Cases in W.D. Tex. (Nos. 20-cv-01210 through 20-cv-01216)
Date: Friday, January 21, 2022 10:38:46 AM
Attachments: [image003.png](#)

Rik-

Thank you for providing additional information to support your request for an extension of the parties' final contention deadlines until March 30. MediaTek continues to believe that such a lengthy extension is not necessary or warranted under the circumstances, but in an effort to avoid bringing a dispute to the Court we will agree to Ocean's request. Please circulate a draft notice of our stipulation prior to filing.

I will also note that Ocean's draft motion indicates that Ocean may seek additional extensions depending on its progress in third party discovery. It is unlikely MediaTek will agree to further extensions, at least because pushing Ocean's final infringement contention deadline further into the discovery period will prejudice MediaTek's ability to take the discovery it needs to defend against Ocean's allegations. As we have repeatedly stated, MediaTek does not use any of the Accused Tools and may need to conduct its own third party discovery to fully defend against Ocean's final infringement theories.

Please let me know if you would like to discuss.

Best,
Stephanie

HAYNES BOONE

Stephanie Sivinski | Partner
stephanie.sivinski@haynesboone.com | (t) +1 214.651.5078

From: Henrik Parker <hparker@devlinlawfirm.com>

Sent: Thursday, January 20, 2022 4:25 PM

To: OceanSemi-WDTX Defs@devlinlawfirm.com <OceanSemi-WDTX_Defs@devlinlawfirm.com>; qe-nvidia-oceansemiconductor@quinnemanuel.com; drewholmes <drewholmes@quinnemanuel.com>

Cc: oceansemi-dlf <oceansemi-dlf@devlinlawfirm.com>; Timothy Devlin <tdevlin@devlinlawfirm.com>

Subject: RE: Ocean Semiconductor Cases in W.D. Tex. (Nos. 20-cv-01210 through 20-cv-01216)

EXTERNAL: Sent from outside Haynes and Boone, LLP
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Counsel:

STMicro has contended that my January 6 email to all defendants proposing to extend the deadline for Final Infringement Contentions was somehow vague about Ocean's proposed extension and the reasons for seeking it.

While Ocean disagrees, attached is a DRAFT of a motion to extend time and the tentative accompanying exhibits that lay out in more detail the reasoning behind Ocean's sought extension.

I note that counsel for at least three of the defendants have emailed me today saying that they will let Ocean know if the parties are at an impasse no later than noon tomorrow. As the issue was raised two full weeks ago and the current February 2 deadline is quickly approaching, Ocean intends to file a motion along the lines of the attached draft no later than tomorrow afternoon unless the parties can come to an agreement before then.

Please let me know as soon as possible whether Defendants will agree to a March 30 extension date so as to avoid troubling the Court.

In addition, should Ocean file a motion, please note that Ocean will likely seek to have the Court resolve its request on an expedited basis.

Best regards,
Rik



Henrik Parker

1526 Gilpin Ave, Wilmington, DE 19806

☎ (302) 300-4541 | 📠 (610) 348-6634

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From: Henrik Parker

Sent: Thursday, January 20, 2022 10:01 AM

To: OceanSemi-WDTX Defs@devlinlawfirm.com <OceanSemi-WDTX_Defs@devlinlawfirm.com>; ge-nvidia-oceansemiconductor@quinnemanuel.com

Cc: oceansemi-dlf <oceansemi-dlf@devlinlawfirm.com>; Timothy Devlin <tdevlin@devlinlawfirm.com>

Subject: RE: Ocean Semiconductor Cases in W.D. Tex. (Nos. 20-cv-01210 through 20-cv-01216)

Counsel:

It has been two weeks since Ocean sought the defendants' agreement to extend the deadline for Final Contentions from February 2 to March 30 (see first email below), and more than a week since my follow up email (see second email below).

To date, Ocean has only received responses from MediaTek and STMicro, both of which would not

agree to Ocean's proposal—offering only an extension to March 4.

This counter-proposal is not feasible as it does not address the underlying issue that third parties such as TSMC are unwilling to complete their production/depositions in response to subpoenas served by Ocean within that timeframe.

As such, the parties are at an impasse and Ocean will move to amend the scheduling order shortly.

Best regards,

Rik



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From: Henrik Parker

Sent: Wednesday, January 12, 2022 10:56 AM

To: OceanSemi-WDTX Defs@devlinlawfirm.com <OceanSemi-WDTX_Defs@devlinlawfirm.com>; ge-nvidia-oceansemiconductor@quinnemanuel.com

Cc: oceansemi-dlf <oceansemi-dlf@devlinlawfirm.com>; Timothy Devlin <tdevlin@devlinlawfirm.com>

Subject: RE: Ocean Semiconductor Cases in W.D. Tex. (Nos. 20-cv-01210 through 20-cv-01216)

Counsel:

Ocean has not heard from any of the defendants re the email below.

Please let us know your position.

Best regards,

Rik



Henrik Parker

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From: Henrik Parker

Sent: Thursday, January 6, 2022 4:58 PM

To: OceanSemi-WDTX Defs@devlinlawfirm.com <OceanSemi-WDTX_Defs@devlinlawfirm.com>; qe-nvidia-oceansemiconductor <qe-nvidia-oceansemiconductor@quinnemanuel.com>

Cc: oceansemi-dlf <oceansemi-dlf@devlinlawfirm.com>; Timothy Devlin <tdevlin@devlinlawfirm.com>

Subject: Ocean Semiconductor Cases in W.D. Tex. (Nos. 20-cv-01210 through 20-cv-01216)

Counsel:

As you know, fact discovery in these actions only opened on December 9, 2021, but the Scheduling Order sets February 2, 2022—less than eight weeks later—as the deadline for the parties to serve final infringement contentions and final invalidity contentions, despite the fact that fact discovery continues for more than five more months thereafter (until July 6, 2022). Under the current schedule, a party will be required to seek leave of the Court to amend their contentions after the February 2 deadline.

As you also know, Ocean has served subpoenas on various third-party tool manufacturers and foundries, several of which are foreign entities (e.g., TSMC, UMC, and ASML). Similarly, Ocean has seen that many of the defendants have served (or are attempting to serve) third party subpoenas directed, at least in part, to invalidity issues (e.g., those to AMD, ASML, Texas Instruments, and the University of New Mexico). Ocean was informed yesterday that additional subpoenas to at least ASML will be served soon. Perhaps more such subpoenas are also forthcoming. At least some of these subpoenas have deposition return dates after February 2.

In its communications with the third parties that Ocean has subpoenaed about their obligations to promptly respond to the subpoenas, several of the third parties have expressed that they cannot reasonably fully respond, complete document production, and provide a witness for deposition thereafter within a time frame that allows for Ocean to prepare comprehensive infringement contentions by February 2. Ocean suspects that the defendants may be in a similar situation with respect to their subpoenas and their invalidity contentions.

In order to alleviate these timing issues, which are essentially an anomaly of these actions where much of the information necessary for both infringement and invalidity issues is in the hands of third parties rather than of the parties, Ocean proposes that the parties jointly agree to extend the February 2 deadline to a date in the latter half of March, e.g., March 30. Although the Court undoubtedly would be receptive to a party's seeking leave to amend their contentions when the reason is the difficulty of obtaining information from third parties (several of them foreign), it would be more efficient for all involved to avoid the need for such motion practice. At the same time, a March 30 deadline still leaves over three months before the close of fact discovery.

Please let Ocean know as soon as possible whether or not the defendants are willing to jointly approach the Court with such a proposal.

Best regards,
Rik



Henrik Parker

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